

#7

RECEIVED

AUG 12 2019

CLERK, U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

In the United States District Court.

The west of Pennsylvania

Hong Nguyen \*

922 sleepy hollow road \*

Castle Shannon, PA. 15234-2222

Plaintiff \*

civil case # 19-986

KARAG FORD SOUTH \*

Serv. Kenny Ross Ford south Inc.

3200 Library road. route 88 \*

3200 Library road. route 88.

Castle Shannon, PA. 15234.-2222

Castle Shannon, PA. 15234-2222

Tel. (412) 881-0001 \*

Tel (412) 881-0001

### COMPLAINT.

I am Auto Technician fulltime job and I worked for KARAG Ford South and business name is Kenny Ross ford South. KARAG Ford South as the paid check and check tub. KARAG FORD SOUTH as Payroll check. And Kenny Ross Ford as Business name in public.

A

Kenny Ross South did not pay of my labor time during I was worked for them. They only pay some of time . the hours they was paid not enough .

B

I was work for Kenny Ross south more than 40 hours per week and over time for them during the hot weather condition to completed of car from costumers require and Service Manager required. Kenny Ross South did not pay enough of my salary even overtime. I was complaint many time .But they still did not pay.

C

Before I got the job .They promised warranty 40 hours a week full time.

**D**

**One of the Service Manager was left his job. Then other new Manager still not pay for after I was complaint my salary.**

**E**

**In July 29<sup>th</sup>,2019 General Manager and Service Manger was force my to signed a suspension that I did not recognized . General Manager said “ you must signed or get termination “ . He planned to do this . I was told him “I did not know any of these what he give me to signed . he keep said “signed or termination”.**

- 1- I did not put the not working door flasher in costumer car**
- 2- I did not put the windshield blade in backward . a week later .The motor was broken 1 hand when came to me to estimate. And I was replace a windshield motor.**
- 3- Wrong diagnostic . which car . he did not know .**
- 4- He did not said the fourth. Fourth in the July only**

**I was asked him” why you not tell me when the happened start the first one then we can go depth in the case . you wait to fourth and not talk in bottom of these.”**

**F**

**Kenny Ross South pay for of all time during I am not working and looking for other job.**

**G**

**Kenny Ross South must pay for court cost of this action**

**H**

**Kenny Ross South must pay for of my Health was sick of this mental .I do not know what happened and why General to do this to me and hurt me and family**

**I**

**Kenny Ross South very hard time for me during I was worked for them .sometime I am looking for car . I was asked for a front Driver “ the man had a**

**Little long bear “ He was a service driver .He did not want to show where was he parking the costumer car at during I could not to find the car in the Work Order . He always got mad and crushing on me when I was asked him.**

**J**

**Kenny Ross Ford South had problem pay labor hours employees salary. I saw many other employees complained every day in the office**

**K**

**Kenny ross ford South does not pay corrected the salary . The clerk got this Work Order pay for other Work Order . Then other Work Order did not match with pay labor time.**

**L**

**I had very hard time to do my job during I worked for Kenny Ross ford south , my healthy lost every day and feel illness . by my salary did not pay and all conversation to tell them of labor time . they forget or will do and never come to fix for long time . But the problem still .**

I

**Worked hours and paid by Kenny Ross ford South.****HONG M NGUYEN work ID # 85085**

Date	Start work	end work	total	Lunch	Daily Worked
Thursday 6/6/2019	7:15 AM through	6:05 PM	11:55 Hours	30 '	10:25 Hours
Friday 6/7/2019	7:15 AM -	5:15 PM	10 Hrs.	30'	9:30 Hrs.
Saturday 6/8/2019	7: 35 AM -	12:00 PM	4:25 Hrs.	0	4:25 Hrs.
<b>Total Hours :</b>			<b>25:20 Hours</b>	<b>1 Hours</b>	<b>24.20 Hours</b>

**KENNY ROSS ONLY PAY 5:20 HOURS ON JUNE 14<sup>TH</sup>,2019**

Monday 6/10/2019	7:20 AM -	7:15 PM	11:55 Hrs.	30'	11:25 Hrs.
Tuesday 6/11/2019	7: 20 AM -	6:55 PM	11:35 Hrs.	30'	11:05 Hrs.
Wednesday 6/12/2019	7:15AM -	6:35 PM	11:20 Hrs.	30'	10:50 Hrs.
Thursday 6/13/2019	7:25 AM -	5:35 PM	10:10 Hrs.	30'	9:40 Hrs.
Friday 6/14/2019	7:10 AM -	5:15 PM	10:05 Hrs.	30'	9:35 Hrs.
Saturday 6/15/2019	7:35 AM -	11:35 AM	4 Hrs.	0	4 Hrs.

<b>Total :</b>			<b>59:05 Hours</b>	<b>2:30 Hours</b>	<b>56.35 Hrs.</b>
----------------	--	--	--------------------	-------------------	-------------------

Monday 6/17/2019	7:20 AM -	7:05 PM	11:45 Hrs.	30'	11:15 Hrs.
Tuesday 6/18/2019	7:25 AM -	7:10 PM	11:45 Hrs.	30'	11:15 Hrs.
Wednesday 6/19/2019	7:20 AM -	6:45 PM	11:25 Hrs.	30'	10:55 Hrs.
Thursday 6/20/2019	7:20 AM -	5:15 PM	9:50 Hours	30'	9:20 Hrs.
Friday 6/21/2019	7:20 AM -	5:10 PM	9:50 Hrs.	30'	9:20 Hrs
Saturday 6/22/2019	7:35 AM. -	11:40 AM	4:05 Hrs.	0	4:05 Hrs.

<b>Total :</b>	<b>56.35Hrs + 58:40 Hrs.</b>	<b>112.45 Hours (2weeks get paid)</b>	<b>59:40 Hours</b>	<b>2:30 Hrs.</b>	<b>56.10Hrs</b>
----------------	------------------------------	---------------------------------------	--------------------	------------------	-----------------

**KENNY ROSS ONLY PAID 54 HOURS ON 6/28/2019.**

## II

Date	Start work	end work	total	lunch	Daily work
Monday 6/24/2019	7:20 AM	7:15 PM	11:55 Hours	30'	11:25 Hours
Tuesday 6/25/2019	7:20 AM	7:05 PM	11:45 Hrs.	30'	11:15 Hours
Wednesday 6/26/2019	7:15 AM	6: 55 PM	11:40 Hrs.	30'	11:10 Hrs.
Thursday 6/27/2019	7:25AM	5:25 PM	10 Hrs.	30'	9:30 Hours
Friday 6/28/2019	7:20 AM	5:05 PM	9:45	30'	9:15 Hours
Saturday 6/29/2019	7:35 AM	11:50 AM	4:15 Hrs.	0'	4:15 Hours
Total :	first week		58:20 hours	2:30 Hrs.	56:50 Hours
Monday 7/1/2019	7:20 AM	6:50 PM	11:30 Hours	30'	11:00 Hours
Tuesday 7/2/2019	7:15 AM	6:15 PM	11:00 Hours	30'	10:30 Hours
Wednesday 7/3/2019	7:20 AM	4:45 PM	9:25 Hours	30'	8:55 Hours
Friday 7/5/2019	7:35 AM	5:25 PM	7:50 Hours	30'	7:20 hours
Saturday 7/6/2019	7:40 AM	11:05AM	3:25 Hours	0'	3:25 Hours
Total :	41:10 hours + 56:50 Hours = 97:6 Hours		43:10 Hrs.	2 Hrs.	41:10 Hrs.

KENNY ROSS ONLY PAID 47 HOURS + 8 Hrs. Holiday ,paid on 7/12/2019.

## III

Date	Start work	end work	total	Lunch	Daily work Hours
Monday 7/8/2019	7:20 AM	6:55 PM	11:35 Hours	30'	11:05 Hours
Tuesday 7/9/2019	7:30 AM	6:35 PM	11:05 Hours	30'	10:35 Hours
Wednesday 7/10/2019	7:35 AM	5:45 PM	10:10 Hours	30'	9:40 Hours
Thursday 7/11/2019	7:35 AM	5:05 PM	9:30 Hours	30'	9:00 Hours
Friday 7/12/2019	7:35 AM	5:00 PM	9:25 Hours	30'	8:55 Hours
Saturday 7/13/2019	7:40 AM	11:10	3.30 Hours	0'	3.3 Hours
Total : First week			55:15 Hours	2:30 Hours	52:45 Hours

Monday 7/15/2019	7:20 AM	2:05 PM	6:45 Hours	0'	6:45 Hours
	Tech School (3:30 Hours)	4:00 PM through	7:30 PM		
Tuesday 7/16/2019	7:20 AM	6:30PM	11:10 Hours	30'	10:40 Hours
Wednesday 7/17/2019	7:30 AM	2:00 PM	6:30 Hours	0'	6:30 Hours
	Tech School (3:30 Hours )	4:00 PM through	7:30 PM		
Thursday 7/18/2019	7:25 AM	5:05 PM	9:30 Hours	30'	9:00 Hours
Friday 7/19/2019	7:20 AM	5:00 PM	9.40 Hours	30'	9:10 Hours
Saturday 7/20/2019	7:35 AM	11:00 PM	3:25 Hours	0'	3:25 Hours
Total :	45.30 Hours +52:45 Hours =98:15 Hours		47: Hours	1:30 Hrs.	45:30 Hours

Kenny Ross only paid 40.10 hours on 7/26/2019.

## IV

Date	Start work	end Work	total	Lunch	Daily work Hours
Monday 7/22/2019	7:30 AM	6:55 PM	11:25 Hours	30'	10:55 Hours
Tuesday 7/23/2019	7:35 AM	6:25 PM	10:50 Hours	30'	10:20 Hours
Wednesday 7/24/2019	7:40 AM	5:05 PM	9:25 Hours	30'	8:55 Hours
Thursday 7/25/2019	7:35 AM	5:00 PM	9:25 Hours	30'	8:55 Hours
Friday 7/26/2019	7:40 AM	5:00 PM	9:20 Hours	30'	8:50 Hours
Saturday 7/27/2019	8:00 AM	11:15 AM	3:15 Hours	0'	3:15 Hours
Total :	First week		53:40 Hours	2:30 Hours	51:10 Hours

Monday 7/29/2019	7:35 AM	12:45 PM	6.1 Hours	0'	6.1 Hours
------------------	---------	----------	-----------	----	-----------

Total 6.1 Hours + 51:10 hours = 57:20 hours

KENNY ROSS ONLY PAY ABOUT 25 HOURS ON FRIDAY 8/9/2019

## A

I had worked total : 24:20 Hrs. + 112:45 Hrs. + 97:60 Hrs. + 98:15 Hrs. + 57:20 hrs. = 390:20 Hrs

But KENNY ROSS FORD SOUTH ONLY PAID ME 174:05 HOURS

390:20 Hours – 174:05 Hours = 216:15 Hours KENNY ROSS FORD SOUTH NOT PAY

## B

Even that the last paycheck from 7/22/2019 through 7/29/2019 I only get pay 625.00 dollars before tax.. they adding total hours wrong and pay less hour labor.

## C

This is all work order that KENNY ROSS FORD SOUTH did not pay and forgot even. I was complained for longtime. Total 12 Work Order ,and They are : (Work Order)

- 1- WO 376051,
- 2- WO 376020 of Use car Department,
- 3- WO376156 replace a gear tone of Van TRASIT,
- 4- WO 376211 Oil change and filter and replace brake

**V**

**5- WO 376213 replace 4wheel brake pads and 4 rotor and caliper only paid 0.5 hour**

**6- WO 376672 replace pass side door window motor and door switch ,oil change rotation 4 tire, replace right rear control arm and 2 wiper blade only pay 3.9 hrs.**

**7- WO 376631 replace under hood shield**

**8- WO 376242 car on a tow Diagnostic, and replace starter ,replace 6 sparkplug replace ignition coil, paid 2.0 hour**

**9- WO 3769996 car over heat . Diagnostic ,replace a fan relay system , thermostat and gasket ,cooling flush .**

**10- WO 376483 Ford Van Transit . Van come for complaint engine over heat ,front brake noise, Tail light and turn signal light not work , fuel door can not close, glove box cannot close and transmission slip when drive .and oil change and filter and 4 tires rotation.**

- a- Replace a fan radiator system , replace thermostat and gasket.**
- b- Replace rear stop brake light unit.**
- c- Replace fuel cylinder door lock.**
- d- Replace front brake pads**
- e- Replace right front tail light bulb**
- f- Replace right front turn signal light bulb**
- g- Oil change and filter and rotation of 4 tires**
- h- Cooling flush .**
- i- Transmission service and change transmission filter and gasket.**

**All work of above .Kenny ross ford only pay 1 hour on 7/26/2019**

**And they pay 2 hours for this work order 376483 from work order 376672 on 7/26/2019 . because WO 376672 was close and did not pay I was complained before.**

**11- WO 377194 missing pay**

**12- WO 377406 missing pay**

**D**

**These are Work Order Kenny Ross ford south pay a part of , and other part missing pay**

**1- 6/10/19 WO 375719 replace 4 tires and balance only pay 0.8 hours**

**2- 6/11/19 WO 375665 R/R clutch automatic transmission and Diagnostic only paid 4.5h**

**3- 6/12/19 WO375589 replace fuel pump rusty Van and Diagnostic only paid 3.4 Hours**

**4- WO 375687 replace engine module , starter and diagnostic only paid 0.9 hours**

**5=WO 375819 replace water pump , cooling flush thermostat and gasket only pay 2.1hou-**



VI

- 6- 6/13/2019 WO 375750 did not pay
- 7- 6/18/2019 WO 375891 replace start ,TCM ( transmission control module) and Diagnostic only paid 1.0 hour
- 8- WO 375993 replace o ting rotation of 4 tires only pay 0.3 hour
- 9- WO 376027 replace outer and inner tire rod ,alignment, replace front brake and ,Did not pay alignment and front brake
- 10- 6/20/2019 WO 374595 not pay
- 11- WO 376131 oil change 4tires rotate vehicle check right front control arm , alignment (not pay alignment ) only pay 2.6 hours
- 12- 6/21/2019 WO 376135 pay the work 0.6 and Diagnostic 0.3 hour
- 13- 6/25/2019 WO 376192 diagnostic and replace right front shaft paid 1.4 hour
- 14- WO 376315 pay nothing
- 15- WO 376327 oil leaking, smell bad ( replace valve cover gasket ,tune air inside of car and oil paid only 1.2 hour
- 16- WO 376348 replace washer motor and diagnostic paid only 1.0 hour
- 17- 6/26/2019 WO 376297 diagnostic replace 2 line of transmission rusty, oi change and rotate 4 tires replace a cover transmission deep stick only paid 0.6+0.6+1.2 hour
- 18- WO 376335 the work 0.6 and EVAP diagnostic R/R?
- 19- 6/28/2019 WO 376406 pay nothing
- 20- 6/29/2019 WO 376280 gasket rock paid 1.9
- 21- 7/1/2019 WO 376280 pay nothing, WO 376506 pay nothing, WO 376519 the work 0.6hour, WO 376521 the work 0.6 hour, WO 376531 the work 0.6 hour. WO 376541the work 0.6 hour ( all day long in Monday 7/1/2019)
- 22- 7/5/2019 WO 376498 paid 4.6 hour then took back4.6 hours 7/10/19 put back 4.0 hours
- 23- 7/9/19 WO 376675 paid 0.3 hour , WO 376787 paid 0.3 ,WO 376763 paid 0.3 battery
- 24- WO 376668 complaint engine over heat , Replace fan relay system ,replace thermostat gasket ,cooling flush , diagnostic only pay 4.1 hours
- 25- 7/10/2019 WO 376272 replace under hood shield paid only 0.3 hour
- 26- 7/12/2019 WO 376742 replace windshield motor and blade only pay 0.8+0.2 =1.0h
- 27- 7/15/2019 WO 377005 missing pay replace pass side right rear light assembly only paid 1.9hs brake and 0.6 the work
- 28- 7/23/2019 WO 377224 oil change rotation 4 tires and inspection paid .3+.5=0.8 hrs.
- 29- 7/24/2019 WO 377194 did not pay
- 30- 7/25/2019 WO 377208 drive belt missing replace drive belt and drive attention and replace rear tire rod and alignment only paid 0.9+0.6+0.6=2.1 hour
- 31- 7/26/2019 WO 377311 replace A/C clutch , Diagnostic vacuum and recharge paid 4.2hrs, did not pay A/C vacuum and recharge.
- 32- WO 377360 replace both side rear tire rod and alignment only pay .6+.6= 1.2 hour

**VII**

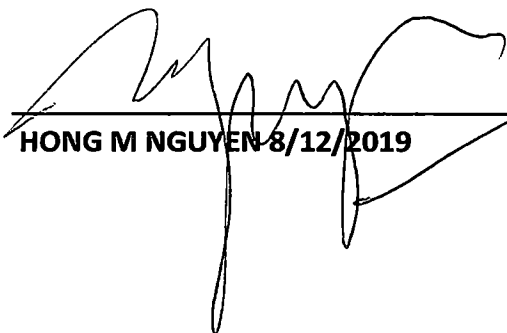
**33- WO 377379 replace a battery only paid 0.3**

**34- WO 377406 did not pay**

**In this Court I am prayer all complaint of above the Kenny Ross Ford South pay of the following:**

- a- Pay for of the labor hours did not pay and owe me the labor over time labor did not pay me.**
- b- Pay for all missing Work Order did not pay .**
- c- Pay for my health was illness of this action.**
- d- Pay for the time I sill looking for another job.**
- e- Pay for the missing income from other job transfer this job.**
- f- Pay for the warranty in this job in 40 hours pay in the week**
- g- Pay for my illness mental of mind during this happened**
- h- Pay for all cost of this action.**
- i- Pay for anything will find down of this action**

**Signature**

  
**HONG M NGUYEN 8/12/2019** 8/12/2019